

[DNFSB LETTERHEAD]

July 2, 1993

The Honorable Hazel R. O'Leary
Secretary of Energy
Washington, D.C. 20585

Dear Secretary O'Leary:

The Defense Nuclear Facilities Safety Board (Board) has reviewed the revised Department of Energy's (DOE) Implementation Plan submitted to the Board on June 21, 1993, for Board Recommendation 91-6 regarding radiation protection programs at DOE defense nuclear facilities. The revised Implementation Plan for Recommendation 91-6 conforms to the standards set forth in the Board's Policy Statement No. 1, "Criteria for Judging the Adequacy of DOE's Responses and Implementation Plans for Board Recommendations" (55 Fed. Reg. 43398) and is therefore acceptable. The Board is pleased that, for the first time, DOE agreed to systematically study the infrastructure and resources devoted to radiation protection programs in contractor, DOE Headquarters, and field organizations with a view toward developing and implementing comprehensive improvements throughout the complex. The Board also approves of the detailed plans that address the need for improving training and staff qualifications in DOE's radiation protection programs. We commend the members of your staff who developed a plan which is in most respects exemplary.

Among the Plan's most important safety commitments is to bring defense nuclear facilities into full compliance with DOE radiation protection orders, guidance, and the Department's radiation protection manual. The Board notes that managers at three defense nuclear facilities project this commitment will not be fully met until 1997 or 1998. Recognizing that these deadlines were of concern to the Board's task group on Recommendation 91-6, DOE included a list of the facilities and the questioned milestones as Appendix D to the Implementation Plan. The Board finds these dates unacceptable from a safety perspective. They should be brought into conformity with deadlines for the vast majority of the defense nuclear facilities which are presented elsewhere in the Implementation Plan. The Board's task group on Recommendation 91-6 remains available to assist your staff.

Sincerely,

John T. Conway
Chairman

Enclosure

Copy to: M. Whitaker, DR-1

APPENDIX D

Department of Energy
Radiological Control Manual
Implementation Dates Beyond October 1996

Appendix D

Radiological Control Manual
Implementation Dates Beyond October 1996

Site	Date for Full Implementation
Albuquerque Operations Office	
Los Alamos National Laboratory	September 1997
Sandia National Laboratories	September 1998
Mound Facility	December 1996
Rocky Flats Office	
EG&G Rocky Flats	October 1997